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October 5, 2020

VIA ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

**Re: *United States v. Ricardo Reynoso*
19 Cr. 735 (KPF)**

Dear Judge Failla:

Please recall that our firm represents Mr. Ricardo Reynoso in the above-referenced matter, which is presently scheduled for sentencing before Your Honor on October 16, 2020, at 3:00 p.m. for an in-court appearance. With the consent of the Government and for the following reasons, the defense respectfully requests a 45-day adjournment of sentencing. This is the second such request by the defense and is due in part to delays caused by the COVID-19 outbreak and in larger part because of my own recent, yet undiagnosed, illness.

The parties have scheduled a so-called “safety valve” proffer for this coming Friday, October 9, 2020, at 2:00 p.m. Once the proffer is completed, we expect to immediately turn to our pre-sentencing submission, which we will file in accordance with Your Honor’s Rules of Practice.

Again, I apologize for not seeking an adjournment late last week. However, I have been unwell and under the circumstances, while I would normally request a 30-day adjournment, I am hopeful that the Court might extend me the courtesy of a 45-day adjournment. If not, we will be ready to move the case to sentencing on whichever date the Court orders.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Ryan Finkel (via ECF)
Mr. Ricardo Reynoso (via email)

Application GRANTED. Mr. Reynoso's sentencing is hereby ADJOURNED to **December 11, 2020, at 3:00 p.m.** The sentencing will take place by video conference. Access instructions will be provided in advance of the proceeding.

Dated: October 5, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE